

## UNITED STATES DISTRICT COURT

for the  
Southern District of Ohio

## In the Matter of the Search of

USPS Priority Mail parcel with tracking number  
13153210000047887901 addressed to "Edgar Holmes, 6118  
Cooper Woods, Westerville, OH 43081" bearing the return  
address of "Trinity Holmes, 15507 S. Normandie  
Ave., Gardena, CA 90247."

Case No. *2:17-mj-481*

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property

USPS Priority Mail parcel with tracking number 13153210000047887901 addressed to "Edgar Holmes, 6118 Cooper Woods, Westerville, OH 43081" bearing the return address of "Trinity Holmes, 15507 S. Normandie Ave., Gardena, CA 90247."

located in the Southern District of Ohio, Eastern Division, there is now concealed (*identify the person or describe the property to be seized*):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1).

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☐ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Title 21 USC 841(a)(1)

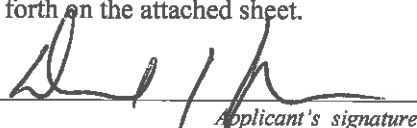
Offense Description

Possession with intent to distribute  
a controlled substance

The application is based on these facts:

As set forth in the attached Affidavit of Postal Inspector DANIEL J. JOHNSON

- ☐ Continued on the attached sheet.  
☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

DANIEL J. JOHNSON, U.S. POSTAL INSPECTOR

Printed name and title

Sworn to before me and signed in my presence.

Date: *Aug 23, 2017*


Judge's signature

City and state: COLUMBUS, OHIO

Elizabeth Preston Deavers, U.S. MAGISTRATE JUDGE

Printed name and title

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN THE MATTER OF  
THE SEARCH OF:

USPS Priority Mail parcel  
13153210000047887901 addressed to  
"Edgar Holmes, 6118 Cooper Woods,  
Westerville, OH 43081"

MISC NO.

2:17-mj-481

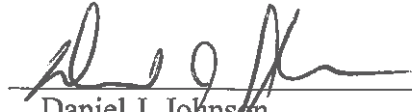
AFFIDAVIT IN SUPPORT OF APPLICATION FOR SEARCH WARRANT

I, Daniel J. Johnson, Postal Inspector, being duly sworn, depose and state as follows:

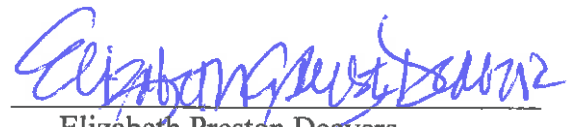
1. I have been a U.S. Postal Inspector for the past nine years, enforcing federal mail and drug laws. I am currently assigned to Columbus, OH. I have received training at the U.S. Postal Inspection Service National Training Seminars for mail-related criminal investigations and have investigated cases with other federal, state, and local police units.
2. The U.S. Postal Inspection Service is aware that drug traffickers have been using Priority Express Mail, a business-oriented service offered by the Post Office, to transport controlled substances and transfer funds, cash or otherwise, to further their enterprises. As a result of past investigations and prosecutions, the Postal Inspection Service has determined that a number of indicators can be used to identify packages containing contraband that have been entered into the Priority Mail network. Inspectors routinely review shipment documents and Express Mail packages originating from or destined to drug source areas to identify instances where there is a possibility of drug trafficking.
3. On August 18, 2017, Postal Inspectors received a call from Columbus Police Detective Kotchkoski. Detective Kotchkoski had conducted a search warrant at 6118 Cooper Woods, Westerville, Ohio 43081. The search warrant resulted in the seizure of contraband, including cocaine. The resident stated that they were expecting more cocaine to be delivered via the U.S. Mail. On August 19, 2017, U.S. Postal Inspectors identified USPS Priority Mail parcel with tracking number 13153210000047887901 that they believed to contain narcotics.

4. On August 19, 2017, Postal Inspectors took custody of USPS Priority Mail parcel with tracking number 13153210000047887901, addressed to "Edgar Holmes, 6118 Cooper Woods, Westerville, OH 43081," and bearing the return address of "Trinity Holmes, 15507 S. Normandie Ave., Gardena, CA 90247." The parcel is a 12.5" x 12.5" x 6" "Priority Mail" cardboard box and was mailed on August 16, 2017, from Gardena, CA 90249 with \$22.20 in postage affixed.
5. According to law enforcement databases and witness statements, the recipient address of 6118 Cooper Woods, Westerville, OH 43081" cannot be associated to "Edgar Holmes."
6. According to law enforcement databases the return address of 15507 S. Normandie Ave., Gardena, CA 90247, cannot be associated to a person named "Trinity Holmes." This address is a commercial receiving agency (CMRA) called "The UPS Store." Your affiant knows that traffickers often use CMRA's to send and receive contraband in an attempt to conceal their true identities and places of residence.
7. Additionally, California is a known source area for shipment of illegal narcotics to Central Ohio, as well as other areas of the United States.
8. On August 21, 2017, Postal Inspectors contacted Sergeant Mark Cartwright, Columbus Police Department, who is the handler for "Lilo," a drug detection dog most recently certified by the Ohio Peace Officers Training Council for the detection of marijuana, hashish, cocaine, "crack," heroin, and methamphetamine. K-9 "Lilo" has had 200 hours of training at Gold Shield Training Kennels, Blacklick, OH, a well-established and regarded training facility for police canines. Both in training and actual deployments, K-9 "Lilo" has successfully detected narcotics and demonstrated clear, positive, aggressive (scratch) alerts, establishing himself as a highly reliable police dog.
9. The subject parcel was hidden among other packages, and "Lilo" was allowed to search the entire area. Sergeant Cartwright concluded that K-9 "Lilo" did alert positively to USPS Priority Mail parcel 13153210000047887901. Based on that alert, Sergeant Cartwright concluded that the odor of one of the drugs that K-9 "Lilo" is trained and certified to detect was present.
10. Based on the information contained herein, your affiant maintains there is probable cause to believe that the USPS Priority Mail parcel bearing tracking number 13153210000047887901 contains controlled substances and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1).

11. Based on the facts set forth in this Affidavit, there is probable cause to believe that controlled substances are being concealed in the parcel. Therefore, I seek the issuance of a warrant to search the parcel for controlled substances to be seized.

  
Daniel J. Johnson  
United States Postal Inspector

Sworn to before me, and subscribed in my presence, this 23<sup>rd</sup> day of August 2017, in Columbus, Ohio.

  
Elizabeth Preston Deavers  
United States Magistrate Judge